

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

RETAIL ACCESS OPTIMIZATION INITIATIVE, 2011

Docket No. N2011-1

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO APWU INTERROGATORIES APWU/USPS-T1-1 AND T1-3 THROUGH 5**

The United States Postal Service hereby provides the responses of witness James Boldt to the above-listed interrogatories of the American Postal Workers Union dated August 15, 2011. Each interrogatory is stated verbatim and followed by the response. Objections have been filed in reference to APWU/USPS-T1-1(d&e) and T1-2.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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RESPONSE OF THE UNITED STATES POSTAL SERVICE TO APWU INTERROGATORY

APWU/USPS-T1-1

Please refer to Library Reference USPS-LR-N2011-1/2. For each facility listed in this Library Reference please provide:

- (a) the hours of operation;
- (b) the facility finance number and corresponding main office finance number, e.g., the finance number assigned to a station and the corresponding finance number for the main post office to which the station reports;
- (c) the street address for each office;
- (d) the type (post office, CPU, approved shipper, stamps on consignment, etc.) and hours of operation of each of the "five postal retail and/or alternate access sites" of each facility listed in this Library Reference; and
- (e) the driving distance and driving time between each facility listed in this Library Reference and its corresponding five "postal retail and/or alternate access sites."

RESPONSE

- (a) A USPS Library Reference containing this information is forthcoming.
- (b-c) A USPS Library Reference containing this information is forthcoming.
- (d-e) Information regarding alternate sites for any postal retail facility and the hours of operation for any postal retail facility is publicly available via the *Find USPS Locations* function at the USPS customer website -- www.usps.com. This function allows members of the public to type in a 5-digit ZIP Code or street address (such as the postal facility street addresses to be provided in the Library Reference described in response to subpart (b), set a proximity range,¹ and find the name, address, directions to, and estimates of distance and drive time to the nearest:
 - *Post Office* [, station and branch] *Locations*
 - *Alternate Locations to Buy Stamps*
 - *Approved Postal Providers* [CPUs, consignment, retail alliance partners]

¹ Of 1, 5, 10 or additional increments of miles.

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Hours of retail operations for Post Offices, stations and branches are available by clicking on the name of any postal facility that shows up in the *Post Office Locations* function.

The Postal Service does not have a centralized data base that reflects the retail hours of alternate access sites. To the extent that such information is relevant to the RAO discontinuance review process, it is collected and analyzed as part of the evaluation of alternate access channels during each facility-specific discontinuance evaluation. Such information is expected to be collected as the numerous RAO Initiative discontinuance studies are conducted in the months ahead. Otherwise, objections have been filed to these interrogatories.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO APWU INTERROGATORY

APWU/USPS-T1-3

Please refer to Page 4, Lines 1-8 of your testimony. Were all of the “alternate access channels” listed in your testimony, including those that only sell postage stamps, considered as “alternate access sites” when determining if a facility qualified for discontinuance review? If not, identify which types of “alternate access sites” were considered when identifying the postal retail facilities for discontinuance review.

RESPONSE

The alternate sites considered for purposes of determining whether a threshold number exist in proximity to a RAO candidate facility are physical sites (nearby USPS retail facilities, CPUs, consignment retailers, retail alliance partners), as opposed to usps.com, Stamps by Mail, or an APC in the lobby of the facility being considered for discontinuance.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
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APWU/USPS-T1-4 Describe the standard types of products and service available in each type of alternative access sites. Where the range of products and services vary with a type, please describe the range of variability.

RESPONSE

See the responses to interrogatories DBP/USPS-6, 43 and 44, as well as

Question 10 of POIR 1.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO APWU INTERROGATORY

APWU/USPS-T1-5 On Page 12, Lines 3-5 of your testimony you state: "given changes in many communities, it is likely that these customers already travel outside their local community to purchase other goods and services and conduct other activities of daily living." Please provide a copy of all studies or other documentation and information you relied upon in coming to this conclusion.

RESPONSE

It is a conclusion based upon my first-hand observations and interactions with postal retail customers and other postal managers and employees at various levels of the organization who interact with people in rural communities and towns beyond suburbia. Generally, rural customers tend to purchase groceries, hardware supplies and other household items at retail locations that often are not within walking distance of where they live. Admittedly, some rural and small town customers may be extremely isolated or mobility-impaired, but generally speaking, those who are not rely on automobile transportation to go to market, to visits banks, places of employment, medical offices, pharmacies, "big box" retailers, and automated teller machines. They also tend to combine multiple transactions or make multiple stops in a single trip from home.